

Feldman, Michael

From: Watson, Lucinda
Sent: Thursday, July 02, 2015 12:52 PM
To: Feldman, Michael
Subject: RE: Please Send me the ERCOT Comments

I am assuming that you believe we should do Synapse work based upon your reading of the MATS RTC?

From: Feldman, Michael
Sent: Thursday, July 02, 2015 11:21 AM
To: Watson, Lucinda; Donaldson, Guy; Kordzi, Joe
Cc: Schoellkopf, Lynde; Snyder, Erik; Smith, Suzanne
Subject: RE: Please Send me the ERCOT Comments

<http://www.gpo.gov/fdsys/pkg/FR-2012-02-16/pdf/2012-806.pdf>

From: Feldman, Michael
Sent: Thursday, July 02, 2015 11:19 AM
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Cc: Schoellkopf, Lynde; Snyder, Erik; Smith, Suzanne
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Here is the RTC for the MATS rule. See the section starting on page 9406 addressing reliability concerns.

They refer to our analysis, independent analyses showing that even more stringent requirements (FGD and FF on all EGUs) would not have serious consequences, discuss flaws in analyses submitted by commenters, etc...

From: Watson, Lucinda
Sent: Thursday, July 02, 2015 10:28 AM
To: Donaldson, Guy; Kordzi, Joe
Cc: Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik; Smith, Suzanne
Subject: RE: Please Send me the ERCOT Comments

Guy = please call me. I think we are talking over each other. In my reading of the ERCOT report, it did not say which particular EGUs might have to shut down.

Based on the e-mail traffic, it did not look like Synapse could come up with which EGUs in Texas would have to shut down, only an at most an agreement with the ERCOT report that because of the myriad EPA regulations, a potential percentage of EGUs in Texas may have to shut down, which would adversely affect the grid.

I am not sure if Synapse agrees with ERCOT, what facts would PD use to recommend fewer controls? We will not know which EGUs so what would be the methodology?

From: Donaldson, Guy
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To: Watson, Lucinda; Kordzi, Joe
Cc: Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik; Smith, Suzanne
Subject: RE: Please Send me the ERCOT Comments

I think we are missing the forest for the trees here. I don't believe it can be a misuse of our resources to investigate whether something we are doing could result in power outages. Feel free to elevate the issue if you feel strongly about it.

I would like the high level review.

5 U.S.C. Sec. 552(b)(5)- Deliberative



From: Watson, Lucinda
Sent: Wednesday, July 01, 2015 4:38 PM
To: Kordzi, Joe; Donaldson, Guy
Cc: Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik; Smith, Suzanne
Subject: RE: Please Send me the ERCOT Comments

There still is no suggestion that having this work done will result in any facts, only potentially an agreement of Synapse with ERCOT's predictions, based upon no facts. Spending monies and/or time now on something that will not benefit the agency at this time could be viewed as misuse of funds and time.

From: Kordzi, Joe
Sent: Wednesday, July 01, 2015 4:10 PM
To: Donaldson, Guy
Cc: Watson, Lucinda; Schoellkopf, Lynde; Feldman, Michael; Snyder, Erik
Subject: RE: Please Send me the ERCOT Comments

Robin DeYoung called me to discuss the possibility of having the ERCOT report reviewed by Synapse. She said that was a possibility, but that we would likely not receive their response until about 8/15, considering the people involved are on vacation for the next 12 days. She said that if they did just an upper-level review of about 8-10 hrs, her contract would probably be able to cover it, but if we wanted a more in-depth review, we would have to talk about moving some funds into her contract.

I have not changed my views that it is not possible to predict what the impact on the grid will be at this time and that any such an assessment is too speculative to be meaningful. However, if you want me to pursue this, then Robin wants me to send her an email w/ some background, the report, and the degree of review desired. Considering that she stated that if they limit their review to 8-10 hrs for an upper-level review we likely wouldn't have to pay for it, we could ask

them to review it from the standpoint of whether they believe there is enough info in the report to reach the conclusions ERCOT did. It may be possible to get this level of review sooner than 8/15. If Synapse then replies that they do believe it merits further review, we can go from there.

From: Donaldson, Guy
Sent: Monday, June 29, 2015 11:19 AM
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If Luminant shuts down all their units and the power goes out and they blame our rules, its going to be a problem for all of us.

I still think we should see whether we can get some feedback from the HQs contractor.

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The beauty of the Administrative Procedures Act, the CAA, and case law is that even if a comment presents reasonable speculation, it remains speculation and therefore no response is required - We have no data upon which to rest a final decision. We can add to the RTC that when/if we receive data in support of the speculation, we will reevaluate.

From: Donaldson, Guy
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You know I guess my problem with just saying no supporting documentation is that we all suspect that Luminant with its financial difficulties will not be able to afford controls. So while its speculation, it seems like reasonable speculation.

From: Watson, Lucinda
Sent: Thursday, June 25, 2015 6:32 PM
To: Schoellkopf, Lynde; Aisling, Kathleen; Kordzi, Joe

Subject: RE: Please Send me the ERCOT Comments

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Schoellkopf, Lynde
Sent: Thursday, June 25, 2015 5:36 PM
To: Watson, Lucinda; Aisling, Kathleen; Kordzi, Joe
Cc: Donaldson, Guy
Subject: RE: Please Send me the ERCOT Comments

From: Watson, Lucinda
Sent: Thursday, June 25, 2015 5:31 PM
To: Aisling, Kathleen; Kordzi, Joe; Schoellkopf, Lynde
Cc: Donaldson, Guy
Subject: Please Send me the ERCOT Comments
Importance: High



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I will read them to see if anything more needed in the RTC other than "Thank you but you provided no data to support your concern. . ."

If they legitimately raise data never raised in any other EPA action on RH, then yes, we need to evaluate. But first we need to determine whether we legally can proceed with the "pat" answer and not go any further. Waste of time otherwise in a time critical process.

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5 U.S.C. Sec. 552(b)(5)- Deliberative



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